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June 23, 2023

Via CM/ECF

Hon. Frederick J. Scullin, Jr., Senior U.S. District Judge
U.S. District Court for the Northern District of New York
James M. Hanley Federal Building & U.S. Courthouse
100 S. Clinton St.
P.O. Box 7255
Syracuse, New York 13261

Hon. Daniel J. Stewart, U.S. Magistrate Judge
U.S. District Court for the Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway, 4th Floor
Albany, New York 12207

Re: **Request for Extended Briefing Schedule**
Prime Capital Ventures, LLC v Reign Financial International, Inc., et al.
Case No.: 1:23-cv-00207 (FJS/DJS)

Dear Judge Scullin and Magistrate Stewart:

This firm represents Plaintiff Prime Capital Ventures, LLC (“Plaintiff”) in the above referenced action. The parties have discussed the Motion to Dismiss filed by Defendants Reign Financial International, Inc., Giorgio Johnson, Gary Mills, and Martin Karo (“Defendants”) and mutually request the Court’s approval of the following briefing schedule:

- July 24: Plaintiff’s opposition to the Motion to Dismiss, and any cross-motion
- September 5: Defendants’ reply in support of Motion to Dismiss, and opposition to any cross-motion by Plaintiffs
- September 25: Plaintiff’s reply in support of cross-motion (if any)

Plaintiff also joins in Defendants’ request for oral argument.

The parties will also confer regarding the possibility of Plaintiff filing an amended complaint on consent. Defendants currently reserve their right to object to an amendment of the complaint, in which case Plaintiff will make a motion to amend by July 24, and the briefing on that motion will proceed as indicated above.

Alternatively, if Defendants consent to an amendment of the complaint, Plaintiff will file the amended complaint by July 24, the current Motion to Dismiss will be deemed withdrawn, Defendants will agree to accept service of the new complaint via their present counsel, and September 5 will be Defendants' deadline to respond to the new complaint (with an answer and/or a new Motion to Dismiss directed to new complaint).

Thank you for your time and attention to this matter.

Very truly yours,

GIRVIN & FERLAZZO, P.C.

By:

Daniel S. L. Rubin, Esq.

Cc: (via CM/ECF)
Adam R. Shaw, Esq.
Blake Goebel, Esq.